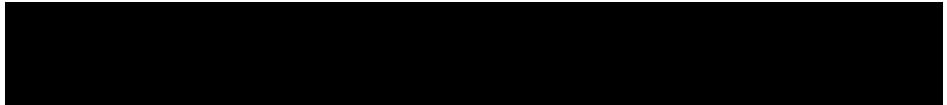


EXHIBIT 7



1 Jacob A. Schroeder (SBN 264717)
2 jacob.schroeder@finnegan.com
**FINNEGAN, HENDERSON, FARABOW,
3 GARRETT & DUNNER, LLP**
3300 Hillview Avenue
4 Palo Alto, California 94304
Telephone: (650) 849-6600
Facsimile: (650) 849-6666

5 Daniel C. Cooley (*pro hac vice*)
6 daniel.cooley@finnegan.com
7 Daniel M. Jordan (*pro hac vice*)
dan.jordan@finnegan.com
**FINNEGAN, HENDERSON, FARABOW,
8 GARRETT & DUNNER, LLP**
1875 Explorer Street
9 8th Floor
Reston, VA, US, 20190-6023
10 Telephone: (571) 203-2700
Facsimile: (571) 203-2777

11 Andrea G. Mills (*pro hac vice*)
gracie.mills@finnegan.com
**FINNEGAN, HENDERSON, FARABOW,
12 GARRETT & DUNNER, LLP**
901 New York Avenue NW
14 Washington, DC 20001-4413
Telephone: (202) 408-4000
15 Facsimile: (202) 408-4400

16 *Attorneys for Defendants*
Motorola Mobility LLC and
17 Lenovo (United States) Inc.

Marc Fenster
mfenster@raklaw.com
Reza Mirzaie
rmirzaie@raklaw.com
Brian Ledahl
bledahl@raklaw.com
Ben Wang
bwang@raklaw.com
Adam Hoffman
ahoffman@raklaw.com
Paul Kroeger
pkroeger@raklaw.com
Neil A. Rubin
nrubin@raklaw.com
James S. Tsuei
jtsuei@raklaw.com
Philip Wang
pwang@raklaw.com
Amy Hayden
ahayden@raklaw.com
Jason M. Wietholter
jwietholter@raklaw.com
Kristopher Davis
kdavis@raklaw.com
Dale Chang
dchang@raklaw.com
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-9226

Attorneys for Plaintiff
Headwater Research LLC

19
20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 OAKLAND DIVISION

23 HEADWATER RESEARCH LLC,
24 Plaintiff,
25 v.
26 MOTOROLA MOBILITY LLC AND LENOVO
(UNITED STATES) INC,
27 Defendants.

Case No. 4:23-cv-04496-JST

**JOINT STIPULATION AND
MOTION TO STAY PENDING
INSTITUTION DECISIONS ON
INTER PARTES REVIEW OF
THE PATENTS-IN-SUIT**

JOINT STIPULATION AND MOTION TO STAY

Plaintiff Headwater Research LLC (“Plaintiff”) and Defendants Motorola Mobility LLC and Lenovo (United States) Inc. (collectively, “Defendants”) jointly stipulate and move to stay the case pending institution decisions of *inter partes* review (IPR) on the Patents-in-Suit as follows:

WHEREAS, on August 12, 2024, Defendants filed two IPR petitions (IPR2024-01180 and IPR2024-01181) challenging all asserted claims of the two Patents-in-Suit (U.S. Patent Nos. 9,198,076 and 10,749,700);

WHEREAS, on August 16, 2024, Defendants filed a motion to stay pending determination of *inter partes* review of the Patents-in-Suit (Dkt. 70);

WHEREAS, claim construction briefing has not started and will be completed until October 2, 2024 (Dkt 69); the claim construction hearing has been postponed until November 18, 2024; and a trial date has not yet been set (Dkt. 67);

WHEREAS, this Court has granted stays pending IPR before institution. *See, e.g.* *WirelessWerx IP, LLC v. Google LLC*, No. 23-cv-01852-JST (N.D. Cal. July 18, 2023) (granting a stay prior to institution of IPR); *MindbaseHQ LLC v. Google LLC*, No. 21-CV-03603-JST, 2021 U.S. Dist. LEXIS 253443, at *10 (N.D. Cal. Nov. 1, 2021) (same).

**WHEREFORE, IT IS HEREBY STIPULATED, AND THE PARTIES JOINTLY
REQUEST THAT THE COURT ORDER THAT:**

The Court grants the parties' joint request to stay the case pending institution decisions of Defendants' IPR petitions on the Patents-in-Suit. All pending deadlines are stayed. Within seven days of the institution decisions in the IPRs (IPR2024-01180 and IPR2024-01181), the parties are ordered to file a joint case management statement apprising the Court of the institution decisions and requesting such further relief as may be appropriate.

Dated: August 27, 2024

RUSS AUGUST & KABAT

By: /s/ Jason Wietholter

Jason Wietholter

*Attorneys for Plaintiff
Headwater Research LLC*

1 Dated: August 27, 2024

2 FINNEGAN, HENDERSON, FARABOW,
3 GARRETT & DUNNER, LLP

4 By: /s/ Daniel C. Cooley

5 Daniel C. Cooley
6 Attorneys for Defendants
7 Motorola Mobility LLC and
8 Lenovo (United States) Inc.

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 [PROPOSED] ORDER

2 The Court grants the parties' joint request to stay the case pending institution decisions of
3 Defendants' IPR petitions on the Patents-in-Suit. All pending deadlines are stayed. Within seven
4 days of the institution decisions in the IPRs (IPR2024-01180 and IPR2024-01181), the parties are
5 ordered to file a joint case management statement apprising the Court of the institution decisions and
6 requesting such further relief as may be appropriate.

7

8 PURSUANT TO STIPULATION, IT IS SO ORDERED.

9 Dated: August 27, 2024

10

11 JON S. TIGAR
12 United States District Judge

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

ATTESTATION

Counsel for Plaintiff Headwater Research LLC hereby attests by his signature below that concurrence in the filing of this document was obtained from counsel for Defendants Motorola Mobility LLC and Lenovo (United States) Inc.

Dated: August 27, 2024

RUSS AUGUST & KABAT

By: /s/ Jason Wietholter
Jason Wietholter
Attorneys for Plaintiff
Headwater Research LLC

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

Dated: August 27, 2024

RUSS AUGUST & KABAT

By: /s/ Jason Wietholter
Jason Wietholter
Attorneys for Plaintiff
Headwater Research LLC